

EILEEN R. RIDLEY, CA Bar No. 151735
eridley@foley.com
ALAN R. OUELLETTE, CA Bar No. 272745
aouellette@foley.com
FOLEY & LARDNER LLP
555 CALIFORNIA STREET
SUITE 1700
SAN FRANCISCO, CA 94104-1520
TELEPHONE: 415.434.4484
FACSIMILE: 415.434.4507

Attorneys for the Defendants listed on
the signature block below

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

DUAL DIAGNOSIS TREATMENT
CENTER, INC., a California corporation,
et al.,

Plaintiffs,

vs.

BLUE CROSS OF CALIFORNIA, dba
ANTHEM BLUE CROSS, et al.,

Defendants.

Case No. 8:15-cv-00736 DOC (DFMx)

Honorable David O. Carter

**STIPULATION FOR DISMISSAL
WITH PREJUDICE AS TO
DEFENDANT ACWA JPIA, SUED AS
ACWA/JPIA EMPLOYEE BENEFITS
PROGRAM**

1 Plaintiffs Dual Diagnosis Treatment Center, Inc., Adeona Healthcare, Inc., Satya
2 Health of California, Inc., Sovereign Asset Management, Inc., Sovereign Health of
3 Phoenix, Inc. and Medical Concierge, Inc. (collectively, “Plaintiffs”) and Defendant
4 ACWA JPIA, sued as ACWA/JPIA Employee Benefits Program (“ACWA”), by and
5 through their respective counsel, hereby stipulate to the following:

6 **RECITALS**

7 WHEREAS, on October 16, 2017, Plaintiffs filed their Third Amended Complaint
8 (“TAC”) [Dkt. 1177];

9 WHEREAS, Plaintiffs’ TAC asserts claims concerning Patient 148;

10 WHEREAS, on January 22, 2020, the parties filed a Notice of Settlement with the
11 Court, encompassing the claims concerning Patient 148 and ACWA [Dkt. 1558];

12 WHEREAS, Plaintiffs and ACWA have now agreed that all claims in this action
13 against ACWA shall be dismissed with prejudice, and ACWA shall be dismissed from
14 the action, with each party to bear its own costs and attorney’s fees;

15 WHEREAS, Plaintiffs and ACWA agree that the claims in this action against
16 ACWA related to Patient 148 will be dismissed with prejudice, with each party to bear its
17 own costs and attorney’s fees.

18 **STIPULATION**

19 NOW THEREFORE, IT IS HEREBY STIPULATED, pursuant to Federal Rule of
20 Civil Procedure 41(a)(2), that all claims in this action against ACWA shall be dismissed
21 with prejudice with each party to bear its own costs and attorney’s fees, and that all
22 claims in this action against ACWA related to Patient 148 shall be dismissed with
23 prejudice with each party to bear its own costs and attorney’s fees.

24 **IT IS SO STIPULATED.**

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DATED: March 18, 2020

FOLEY & LARDNER LLP

Eileen R. Ridley

Alan R. Ouellette

/s/ Eileen R. Ridley

Eileen R. Ridley

Attorneys for Defendants BLUE CROSS OF CALIFORNIA, dba ANTHEM BLUE CROSS, ANTHEM HEALTH PLANS, INC., dba ANTHEM BLUE CROSS AND BLUE SHIELD, ANTHEM HEALTH PLANS OF KENTUCKY, INC., dba ANTHEM BLUE CROSS AND BLUE SHIELD, ANTHEM INSURANCE COMPANIES, INC., dba ANTHEM BLUE CROSS AND BLUE SHIELD, COMMUNITY INSURANCE COMPANY, dba ANTHEM BLUE CROSS AND BLUE SHIELD, EMPIRE HEALTH CHOICE ASSURANCE, INC., dba EMPIRE BLUE CROSS AND BLUE SHIELD, ROCKY MOUNTAIN HOSPITAL AND MEDICAL SERVICE, INC., dba ANTHEM BLUE CROSS AND BLUE SHIELD, ANTHEM HEALTH PLANS OF VIRGINIA, INC., BLUE CROSS AND BLUE SHIELD OF GEORGIA, INC., BLUE CROSS BLUE SHIELD OF WISCONSIN, erroneously sued as THE ANTHEM COMPANIES, INC., ACWA/JPIA EMPLOYEE BENEFITS PROGRAM, BLOOMBERG L.P. HEALTH AND WELFARE PLAN, CNS HEALTH AND WELFARE BENEFITS PLAN, ERNST & YOUNG MEDICAL PLAN, FERGUSON ENTERPRISES INC. FLEXIBLE BENEFITS PLAN, FOLLETT CORPORATION WELFARE BENEFIT PLAN, erroneously sued as FOLLETT CORPORATION EMPLOYEES BENEFIT TRUST, INTEL CORPORATION HEALTH AND WELFARE BENEFIT PLAN, LIVE NATION ENTERTAINMENT, INC. GROUP BENEFITS PLAN, NORTHROP GRUMMAN CORPORATION GROUP BENEFITS PLAN, PEAK FINANCE COMPANY GROUP HEALTH PLAN, PEPSICO EMPLOYEE HEALTH CARE PROGRAM, SHEET METAL WORKERS LOCAL NO. 40 HEALTH FUND, THE AEROSPACE CORPORATION GROUP HOSPITAL-MEDICAL PLAN, THE STEAK

1 N SHAKE EMPLOYEE BENEFIT PLAN,
2 VIASAT INC. EMPLOYEE BENEFIT
3 PLAN and XEROX CORPORATION
4 WELFARE PLAN

5 DATED: March 18, 2020

6 **KANTOR & KANTOR, LLP**

7 Lisa S. Kantor
8 Timothy R. Rozelle

9 /s/ Timothy R. Rozelle

10 Timothy R. Rozelle

11 Attorneys for Plaintiffs DUAL DIAGNOSIS
12 TREATMENT CENTER, INC., SATYA
13 HEALTH OF CALIFORNIA, INC.,
14 ADEONA HEALTHCARE, INC.,
15 SOVEREIGN HEALTH OF FLORIDA,
16 INC., SOVEREIGN HEALTH OF
17 PHOENIX, INC., SOVEREIGN ASSET
18 MANAGEMENT, INC., and MEDICAL
19 CONCIERGE, INC.

20 *Filer's Attestation: Pursuant to Local Rule 5-4.3.4(a)(2)(1), Eileen R. Ridley hereby*
21 *attests that concurrence in the filing of this document and its contents was obtained from*
22 *all signatories listed.*
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